



North America Europe Asia

1901 L Street, NW
Washington, DC 20036
T +1 202 282 5000
F +1 202 282 5100

ABBE DAVID LOWELL

Partner
202-282-5875
ADLowell@winston.com

May 25, 2022

VIA ECF

Honorable Brian M. Cogan
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Al Malik Alshahhi, et. AL, No. 1:21-cr-00371 (BMC)

Dear Judge Cogan:

Defendant Matthew Grimes filed a number of pending motions in connection with the original indictment in this case. *See* Dkt. 71 (Motion to Dismiss the Indictment), Dkt. 70 (Motion for Grand Jury Screening Records), Dkt. 84 (Reply in further support of the Motion to Dismiss), Dkt. 85 (Reply in further support of Motion for Grand Jury Screening Records), and Dkt. 91 (Letter joining Sections I, II and IV of Thomas J. Barrack's motion to compel discovery, Dkt. 89). On behalf of Mr. Grimes, we respectfully write to renew the existing motions to dismiss the counts against him in the superseding indictment (Dkt. 105, filed on May 16, 2022), and note that the government's additional allegations in paragraphs 96 – 110 in the superseding indictment, in the section titled "The Defendants' Efforts to Obtain Investments from United Arab Emirates Sovereign Wealth Funds," only strengthen the arguments previously briefed on the "legal commercial transaction" exception. *See* Dkt. 71 at 8–10; Dkt. 84 at 6–8.

We appreciate the Court's consideration on this issue.

Respectfully,

/s/ Abbe David Lowell

Abbe David Lowell
Christopher D. Man
Andrew E. Tauber
WINSTON & STRAWN LLP
1901 L Street, NW
Washington, DC 20036
ADLowell@winston.com
202-282-5000 (ph)
202-282-5100 (fax)

Sofia Arguello
Johanna Rae Hudgens
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
SArguello@winston.com
212-294-6700 (ph)
212-294-4700 (fax)

Counsel for Defendant Matthew Grimes



May 25, 2022
Page 2

cc: All counsel of record (via ECF)